

This comment comes in regard to iBiquity's IBOC format on the existing AM and FM bands.

IBOC is destined to failure. What you have is a service that is not in demand. Most people who complain or stop listening to the radio complain about WHAT is on the air and NOT how it sounds from a technical standpoint (we can all thank the Telecommunications Act of 1996 for this).

IBOC seeks to do three things. It will make equipment manufacturers richer, it will allow the Clear Channel's of the world to gobble up radio stations that cannot afford to buy the new equipment needed and it will make every single AM (and many FM) radios obsolete.

iBiquity claims CD like fidelity in FM broadcasts and FM like quality in AM broadcasts... but at what cost? AM analog bandwidth narrowed to 5kHz? Adjacent channel problems in the analog FM mode with all the squeezed in 80-90 stations? FM quality audio on AM that is UNSTABLE AT NIGHT and buffers like a computer stream? CD quality digital audio on FM that exhibits the same buffering problem? Who knows what E-skip and tropo will do to digital FM?

And then try telling radio listeners that their existing radios are obsolete. How do you know listeners will embrace this new technology? If they don't, how will radio stations feel after spending so much on the transition? Believe me, I've heard IBOC and am far from impressed with the "improved" audio quality and very concerned about the future of radio.

If the commission is looking for ways to improve radio broadcasting, the first thing you need to do is repeal Telecom 1996. Radio has been packaged and delivered to thousands of stations across the country as a vanilla product thanks to Clear Channel and voice tracking. This is a DIRECT result of the 1996 act that allowed Clear Channel to run radio stations like an assembly line, completely ignoring the local angles in the many communities they serve. Radio stations that sound alike and play the same 200 songs over and over turn off many listeners. You can research to your heart's content, but people simply get tired of the same product over and over. You kill the monopolies and the values of the radio stations fall to the point where people can afford to buy and program radio stations that are in touch with the PEOPLE they serve (radio belongs to the people... remember???)

After you've improved Telecom 1996, you can then turn your attention to the radio manufacturers who can't make a product worth listening to. One major IBOC issue for me would have to be giving up my older, quality AM and FM radios for brand new, digital garbage receivers. The question is: why were radio manufacturers building better radios and receivers in 1982 than in 2002? FM sections on newer radios overload and have major sensitivity and selectivity problems (and much of this comes from sloppy PLL digital tuning designs).

As for AM, a broadcast standard was adopted with NRSC pre-emphasis and low-pass filtering. The idea was for manufacturers to build radios that would perform to the new standard. AM radios today are just the opposite. You're LUCKY to get 3kHz response out of the average receiver. Manufacturers should have been forced to build radios to this standard. Bandwidth selection should be allowed so listeners can enjoy full fidelity on locals, yet still have the ability to narrow the bandwidth for DX listening. Radios that feature FM stereo should also feature C-QUAM AM stereo in the wideband mode. C-QUAM receivers today are much better and audio performance is excellent on locals (and C-QUAM is fully compatible to analog AM broadcasting as we know it).

I seriously hope the FCC decides not to adopt this new digital format and instead looks to correct the easily correctable sins of analog broadcasting. Digital is NOT always better. In this case, it is quite obvious, but will we be able to see the forest thru the trees? Will we be able to resist the dollar signs from major corporations and do what is right for the public?